

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ANDREW PERRONG and STEWART ABRAMSON,
individually and on behalf of all others similarly situated,

Plaintiff,

-against-

CHARLES BARATTA LLC, a New York limited liability
company, ARKADY FREKHTMAN ATTORNEY AT
LAW, P.C. d/b/a FREKHTMAN & ASSOCIATES, a New
York professional corporation, FLEMING NOLEN & JEZ
LLP, a Texas limited liability partnership, RELIABLE
LEGAL MARKETING CONSULTING, LLC, a Florida
limited liability company, KRAUSE AND KINSMAN
LAW, LLC, a Missouri limited liability company,
LERNER & ROWE, PC, an Arizona professional
corporation, and GACOVINO, LAKE & ASSOCIATES,
P.C., a New York Professional corporation.,

Defendants.

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Docket No.:
2:21-cv-0996 (JS)(AYS)

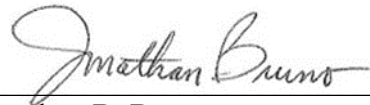
**NOTICE OF MOTION
TO DISMISS**

PLEASE TAKE NOTICE that upon the attached Declaration of Jonathan B. Bruno and the exhibit annexed thereto, the Affidavit of George Fleming, sworn to on February 21, 2022, and the accompanying Memorandum of Law, Defendant Fleming Nolen & Jez, LLP, by their attorneys, Rivkin Radler LLP, will move this court before the Honorable Joanna Seybert, of the United States District Court for the Eastern District of New York, 100 Federal Plaza, Central Islip, New York 11722, with oral argument on a date and time to be designated by the court, for an Order: (1) Dismiss the Third Amended Complaint, pursuant to Fed. R. Civ. P 12(b)(2), on the basis that the Court lacks personal jurisdiction; (2) and for such other and further relief that this court deems just and proper.

Dated: New York, New York
February 22, 2022

Yours, etc.,
RIVKIN RADLER LLP
Attorneys for Defendant
Fleming Nolen & Jez, LLP

By:

A handwritten signature in cursive script, appearing to read "Jonathan Bruno", written over a horizontal line.

Jonathan B. Bruno
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